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Executive Vice President

February 26, 1992

Joseph J. Maraziti, Jr., Esq.
Maraziti, Falcon & Gregory
65 Madison Avenue
Morristown, NJ 07960

Re: 206001 - City of Perth Amboy Madison
Industries Remedial Investigation Work Plan

Dear Mr. Maraziti:

We have reviewed the Remedial Investigation Work Plan for Madison Industries in Old Bridge, New Jersey, dated January 15, 1992, prepared by Converse Consultants East. The Work Plan has been prepared in response to NJDEPE's directives. The document contains approximately nine (9) pages of text and one (1) figure dealing specifically with the Madison Industries investigation and the remainder is descriptions of the standard operating procedures and protocols associated with the field investigation, sampling and analysis.

There are repeated references in the documents which tend to narrow the scope of concern to the Madison Industries site itself. This self-imposed limitation will have many impacts on the extent of the ongoing investigation activities and will lead to an incomplete identification of the nature and extent of the contamination in the Runyon Watershed.

Section IIB on Page 1 reads in part as follows:

"Site History Background
Between April 1970 and December 1979 a variety of major storage tank ruptures resulted in the spillage of zinc sulphate and zinc chloride solutions. Nine spills during this period resulted in the loss of about 80,000 gallons of solution."

Section IIB continues on Page 2 where the following is stated:

"Based on monitoring well data collected in 1981 and 1982, a plume of contaminated ground water (metals and volatile organics) was identified extending from beneath Madison's property all the way to Pricketts Pond."

Sediment samples were previously collected from Pricketts Pond and a summary of that data was presented in the CPS Chemical Company Work Plan dated January 30, 1992. Metals including zinc, lead and cadmium were found in the sediments. Converse Consultants East acknowledges that the contamination plume is spreading toward Perth Amboy's water supply wells. The Work Plan does not include the evaluation of this contamination of the City of Perth Amboy Runyon Watershed property. The Work Plan instead relies totally upon the present ground water recovery system and conducting twenty (20) new soil borings all on the Madison site.

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The Work Plan therefore does not propose to undertake a Remedial Investigation of the substantial areas of the Perth Amboy Runyon Watershed which have been contaminated. The data contained in the Remedial Investigation indicate prior contamination by volatile organic compounds and heavy metals of the sediments in Pricketts Pond. Continuing investigations indicate contamination of the ground water several thousand feet south of Madison Industries to Perth Amboy's Production Wells No. 5 and 6. In our opinion, the remedial investigation should include appropriate evaluation of the contamination on the City's Runyon Watershed and the water supply wells.

In our opinion the remedial investigation falls dramatically short of the stated requirements as mandated by NJDEPE and as required under CERCLA. The approach taken in the Remedial Investigation Work Plan documents the position of the industry which is that a true Remedial Investigation is not required. As Maraziti, Falcon & Gregory and the City of Perth Amboy have previously indicated, it is inappropriate for the industries to be allowed to undertake this investigation. The scope of work contained in the Work Plan dated January 15, 1992 documents the intent to take a short cut approach which does not comply with the Federal or State requirements. The Remedial Investigation should be undertaken by an independent contractor to the USEPA.

Should you have any questions or comments with regard to our assessment of the Remedial Investigation Work Plan prepared for Madison Industries, by Converse Consultants East, please do not hesitate to contact us.

Very truly yours,

KILLAM ASSOCIATES

A handwritten signature in dark ink, appearing to read "Fletcher N. Platt, Jr.".

Fletcher N. Platt, Jr., P.E.

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